

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,)	
)	JURY TRIAL DEMANDED
v.)	
)	
ROSS INTELLIGENCE INC.,)	PUBLIC VERSION
)	
Defendant/Counterclaimant.)	

**DECLARATION OF WARRINGTON S. PARKER III IN SUPPORT OF DEFENDANT
ROSS INTELLIGENCE INC.'S RESPONSE TO PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT ON DIRECT COPYRIGHT
INFRINGEMENT AND RELATED DEFENSES**

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*Attorneys for Defendant/Counterclaimant
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Dated: October 30, 2024
11852873 / 20516.00001

Public Version Dated: November 4, 2024

I, Warrington S. Parker III, declare as follows:

1. I am a partner at Crowell & Moring, LLP, lead counsel of record for ROSS Intelligence, Inc. I am licensed in the State of California and admitted *pro hac vice* with this Court. I submit this Declaration in support of Defendant ROSS Intelligence Inc.'s ("ROSS") Response to Plaintiffs' Motion for Partial Summary Judgment on Direct Copyright Infringement and Related Defenses.

2. Attached hereto as **Exhibit 1** is a true and correct copy of *Pennell v. Delta Transp. Co.*, TR-0812245 (December 22, 1892), produced by Plaintiffs in this litigation.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Copy of Deposit, TXu 2-17-178-620 (00501678120), TR-0026188, produced by Plaintiffs in this litigation.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation's Responses and Objections to ROSS's Third Set of Interrogatories (Nos. 14-21) (February 24, 2022).

5. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation's Responses and Objections to ROSS's First Set of Requests for Admission (Nos. 1-129) (April 6, 2022).

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the deposition transcript of Laurie Oliver (March 30, 2022).

7. Attached hereto as **Exhibit 6** is a true and correct copy of Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GMBH and West Publishing

Corporation's Responses to ROSS's First Set of Counterclaim Interrogatories (Nos. 22-28) (May 11, 2023).

8. Attached hereto as **Exhibit 7** is a true and correct copy of the West Key Number System on Westlaw Next, TR-0179843, produced by Plaintiffs in this litigation.

9. Attached hereto as **Exhibit 8** is a true and correct copy of an article titled, Free vs. Westlaw: Why You Need the West Key Number System, TR-0179838, produced by Plaintiffs in this litigation.

10. Attached hereto as **Exhibit 9** is a true and correct copy of Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation's Third Supplemental Responses and Objections to ROSS's Interrogatory No. 1 (August 22, 2022).

11. Attached hereto as **Exhibit 10** is a true and correct copy of U.S. Patent No. US 7,065,514 B2, TR-0036398 (June 20, 2006), produced by Plaintiffs in this litigation.

12. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the deposition transcript of Erik Lindberg (March 22, 2022).

13. Attached hereto as **Exhibit 12** is a true and correct copy of Thomson Reuters' Editorial Manual, Policies and Guidelines for Headnoting, Judicial Editorial, TR-0002864, produced by Plaintiffs in this litigation.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Thomson Reuters' Summarization Manual, Judicial Editorial, TR-0040273, produced by Plaintiffs in this litigation.

15. Attached hereto as **Exhibit 14** is a true and correct copy of Thomson Reuters Westlaw presentation by Wayne Chang, TRCC-00686613 (October 23, 2020), produced by Plaintiffs in this litigation.

16. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts from the deposition transcript of Andrew Arruda (March 30, 2022).

17. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from the deposition transcript of Tariq Hafeez in the *West Publishing Corp. v. LegalEase Solutions, LLC* matter, Civ. Case. No. 18-CV-01445 (DSD/ECW) (December 18, 2018), TR-0039044, produced by Plaintiffs in this litigation.

18. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from the deposition transcript of Cameron Tario (April 27, 2022).

19. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts from the deposition transcript of Mark Hoffman (March 16, 2022).

20. Attached hereto as **Exhibit 19** is a true and correct copy of a slide titled, Vetting Customers – High Usage and Competitors, TR-0908413, produced by Plaintiffs in this litigation.

21. Attached hereto as **Exhibit 20** is a true and correct copy of an email from Julie Smith re LegalEase Solutions, TR-0037754 (January 11, 2018), produced by Plaintiffs in this litigation.

22. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts from the deposition transcript of Andrew Martens (March 25, 2022).

23. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts from the deposition transcript of Tomas Van Der Heijden (March 17, 2022).

24. Attached hereto as **Exhibit 23** is a true and correct copy of excerpts from the deposition transcript of Tariq Hafeez (May 26, 2022).

25. Attached hereto as **Exhibit 24** is a true and correct copy of excerpts from the deposition transcript of Christopher Cahn (May 12, 2022).

26. Attached hereto as **Exhibit 25** is a true and correct copy of excerpts from the deposition transcript of Teri Whitehead (April 18, 2022).

27. Attached hereto as **Exhibit 26** is a true and correct copy of excerpts from the deposition transcript of Jimoh Ovbiagele (April 12, 2022).

28. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts from the deposition transcript of Barbara Frederiksen-Cross (November 11, 2022).

29. Attached hereto as **Exhibit 28** is a true and correct copy of the Best Practices Guide for ROSS Intelligence, TR-0045731 (September 14, 2017), produced by Plaintiff in this litigation.

30. Attached hereto as **Exhibit 29** is a true and correct copy of an email from Merin Sony re ROSS Bulk Memo – July 21, 2017, R-LEGALEASE-00050673 (July 20, 2017), produced in this litigation.

31. Attached hereto as **Exhibit 30** is a true and correct copy of an email from Steven Babb re Westlaw Logins, TR-0047926, produced by Plaintiffs in this litigation.

32. Attached hereto as **Exhibit 31** is a true and correct copy of excerpts from the deposition transcript of Charles von Simon (April 19, 2022).

33. Attached hereto as **Exhibit 32** is a true and correct copy of the Supplemental Expert Report of Dr. Jonathan L. Krein (August 11, 2024).

34. Attached hereto as **Exhibit 33** is a true and correct copy of the Reply Expert Report of Dr. Jonathan L. Krein (October 10, 2022).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at London, United Kingdom on this 30th day of October, 2024.

/s/ Warrington S. Parker III
Warrington S. Parker III